

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

CRIMINAL NO. 21-173 (ADC)

v.

[3] BRIAN D. BRIONI-CASTELLANOS,
Defendant.

**UNITED STATES OF AMERICA’S RESPONSE TO “MOTION REQUESTING
MODIFICATION OF CONDITIONS OF RELEASE”**

Defendant has moved for a modification of his conditions of release to remove the curfew condition which required him to stay home from 10:00pm to 6:00am. ECF No. 59. In support of his request, Defendant avers that he has been offered employment which requires him to leave his residence at 4:00am. Id.

While at first glance the charges on the Indictment appear nonviolent, they stem from a robbery committed earlier that day. See ECF No. 3 at ¶ 4. At the detention hearings, the Government proffered that this was not an isolated event. Indeed, the United States has evidence that Defendant was involved in other robberies and thefts.

In light of the above, if the Probation Officer is able to corroborate the proffered employment and schedule, the United States does not object to a modification of Defendant’s

curfew schedule in order to allow him to accept the employment offer.¹ However, we submit that the curfew condition should remain in place.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 9, 2021

W. STEPHEN MULDROW
UNITED STATES ATTORNEY

s/ Jeanette M. Collazo-Ortiz
Jeanette M. Collazo-Ortiz, 226803
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

s/ Jeanette M. Collazo-Ortiz
Jeanette M. Collazo-Ortiz, 226803

¹ The co-defendants are subject to Home Detention with Electronic Monitoring.